

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

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PUBLIC UTILITIES  
COMMISSION

In the Matter of ) DOCKET 2009-0108  
)  
PUBLIC UTILITIES COMMISSION )  
)  
Instituting a Proceeding to )  
Investigate Proposed Amendments )  
To the Framework for Integrated )  
Resource Planning. )

**LIFE OF THE LAND'S**  
**RESPONSES TO INFORMATION REQUESTS FROM**  
**HECO & HREA**  
**&**  
**CERTIFICATE OF SERVICE**

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**HECO/LOL-IR-1.** Please elaborate on what is expected to occur under "a single IRP-2 docket"; i.e., one plan for all three systems or each system to have a plan of their own but for the three IRPs to be conducted simultaneously.

**LOL Answer:** If HECO intends to tie the island grids together, so that each island can get power from the other islands under HECO, MECO and/or HELCO control, then there needs to be an over-arching IRP Framework above or besides the county planning processes. If Lanai and/or Molokai supplies power to Oahu, then the Advisory Boards of both the MECO and HECO planning processes needs to be involved. If one scenario looks at starting an inter-island cable to the Big Island within the next 20-years, then the Big Island Advisory Board must interact with the other Advisory Boards. The utility should establish video conferencing to allow the members of both or all Advisory Boards to speak to each other.

**HECO/LOL-IR-2.** If the HECO Companies were to propose in the CESP Framework that the CESP process would have a neutral facilitator (similar to the role of an Independent Observer under the Framework for Competitive Bidding) leading all Advisory Committee meetings, public hearings ... would that be an acceptable means for addressing the concerns over public participation and transparency in the CESP process?

**LOL Answer:** We have not seen the process involving the Independent Observer under the Framework for Competitive Bidding. We have not reviewed how the Observer system works. However, a facilitator and an observer are fundamentally different. One observes, one facilitates. In addition, there are a number of ways of appearing to use a facilitator while maintaining control. This can be done by determining who sits of the Advisory Board, who chairs the Advisory Board, controlling the agenda, writing up the meeting notes, controlling who makes presentations, controlling what the Commission is formally told. The proof is in the pudding. It is important that the process be open and transparent.

**HREA-IR-1.** HREA proposed a set of governing principles ... These proposed principles are listed below without the explanatory text that was included in our PSOP, and edited for clarity. Those principles that can be supported (with or without comments). Those principles that cannot be supported (with comments).

**LOL Answer:** We can generally support at this time, prior to our developing our Final Statement of Position, most of your governing principles, without the need for comments, with a few exceptions including your statements (1) "Establish and maintain a "no regrets policy" for ... renewables" (2) "Design, modify, and operate the utility system to maximize the use of clean

energy resources” and (3) “Incorporation of appropriate analytical methodologies, such as ... clean energy scenario planning.”

Life of the Land supports low climate impact indigenous renewable energy systems.

According to the Hawaii Clean Energy Initiative Regulatory and Policy Framework Strawman:

"No-regrets resources -- Upon completion of the ESP analyses, the utility should look for common themes, assets and strategies that demonstrate robust value to reduce costs and risks across many of the scenarios and cases examined. These are likely to be 'no-regrets' resources and strategies that will give the utility and state the greatest value and flexibility across a wide range of potential futures and uncertainties."

I have no idea what this actually means. Allowing anyone to pick and choose what they want from multiple scenarios -- will allow them to go with what they wanted to go with in the first place -- before the scenarios were developed. Their plan may or may not maximize anything. Furthermore, this Strawman did not mention "global warming" or "climate change".

Low climate impact indigenous renewable energy systems overlap with, but are distinct from “renewables” and “clean” energy. Renewable energy is defined under state law to include some fossil fuels. State law does not differentiate between high and low greenhouse gas emitting fossil fuels, nor between high and low greenhouse gas emitting renewable energy. Nor does state law look at the life cycle impacts. The term "clean energy" is even more confusing. First, no energy source is clean. Second, the term clean energy was created as public relations buzzwords to sound great. Third, clean energy appears to be more focused on building costly infrastructure, streamlining government regulations and ensuring the financial profitability of the utility -- rather than on creating a diversified low climate impact indigenous renewable energy world where non-utility companies are part of the picture and issues like solving the climate change disaster are dealt with.

**Certificate of Service**

I hereby certify that I have served the original and four copy of the Life of the Land's RESPONSES TO INFORMATION REQUESTS FROM HECO & HREA to the Commission, one copy by mail to DBEDT and the Consumer Advocate, and an electronic email to all of the parties listed below.

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